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 **BELLSOUTH S.A.**

BellSouth Telecommunications, Inc.
Legal Department
1600 Williams Street
Suite 5200
Columbia, SC 29201

patrick.turner@bellsouth.com

Patrick W. Turner
General Counsel-South Carolina

803 401 2900
Fax 803 254 1731

August 8, 2005

RECEIVED

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PSC SC
DOCKETING DEPT.

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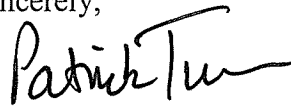
Mr. Charles Terreni
Chief Clerk of the Commission
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: Petition to Establish Generic Docket to Consider Amendments to Interconnection
Agreements Resulting From Changes of Law
Docket No.: 2004-316-C

Dear Mr. Terreni:

Enclosed for filing are an original and ten copies of BellSouth Telecommunications, Inc.'s Motion for Admission *Pro Hac Vice* of R. Douglas Lackey in the above-referenced matter. By copy of this letter, I am serving the same on all parties of record.

Sincerely,



Patrick W. Turner

PWT/nml
Enclosures
cc: All Parties of Record
DM5 # 593938

SERVICE: N/A tod

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

In Re:

Petition to Establish Generic Docket to
Consider Amendments to Interconnection
Agreements Resulting From Changes of Law

Docket No. 2004-316-C

SO. CAROLINA
PUBLIC SERVICE COMMISSION
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FILED

MOTION FOR ADMISSION PRO HAC VICE

BellSouth Telecommunications, Inc. ("BellSouth") respectfully moves the Public Service Commission of South Carolina ("the Commission") to permit R. Douglas Lackey, to practice pro hac vice before the Commission in the above-referenced matter. Pursuant to Rule 404 of the South Carolina Appellate Court Rules, Mr. Lackey, together with the undersigned counsel of record, have filed an application for admission *pro hac vice* with the Supreme Court of South Carolina. Exhibit A to this Motion is a file-stamped copy of that application, along with a Certificate of Service indicating that the application and the \$100 filing fee have been filed with the Supreme Court.

Respectfully submitted, this 8th day of August 2005.

BELLSOUTH TELECOMMUNICATIONS, INC.



PATRICK W. TURNER
Suite 5200
1600 Williams Street
Columbia, South Carolina 29201
(803) 401-2900

Printed on Demand

2005 APR -8 PM 2:44

800 PUBLIC
OCCASION

EXHIBIT A



BellSouth Telecommunications, Inc.
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Suite 5200
Columbia, SC 29201

patrick.turner@bellsouth.com

Patrick W. Turner
General Counsel-South Carolina

803 401 2900
Fax 803 254 1731

August 8, 2005

RECEIVED

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S.C. SUPREME COURT

Ms. Gail Watts
Deputy Clerk for Admissions
South Carolina Supreme Court of Bar Admissions
Post Office Box 11330
Columbia, South Carolina 29211

Re: Petition to Establish Generic Docket to Consider Amendments to
Interconnection Agreements Resulting From Changes of Law
Docket No.: 2004-316-C

Dear Ms. Watts:

Pursuant to Rule 404 of the S.C.A.C.R., enclosed for filing are the original and one copy of BellSouth Telecommunications, Inc.'s Motion for Admission *Pro Hac Vice* of R. Douglas Lackey in the above-referenced matter with the requested filing fee of \$100.00.

If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,

Patrick W. Turner

PWT/nml
Enclosures
DM5 # 593933

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

In Re:)	
)	Docket No. 2004-316-C
Petition to Establish Generic Docket to)	
Consider Amendments to Interconnection)	
Agreements Resulting From Changes of Law)	
_____)	

Comes now R. Douglas Lackey, applicant herein, and respectfully represents the following:

1. Applicant is an employee of BellSouth Telecommunications, Inc., 675 West Peachtree Street, NE, Atlanta, Fulton County, Georgia, 30375, Telephone Number 404-335-0747, Fax Number 404-614-4054, as in-house counsel.

2. Applicant has been retained personally or as a member of the above named law firm to provide legal representation in connection with the above case now pending before named court of the State of South Carolina.

3. Since June 11 of 1973, applicant has been, and presently is, a member in good standing of the bar of the highest court of the State of Georgia. Attached is a certificate of good standing.

4. Applicant has been admitted to practice before the following courts:

Court:	Date Admitted:
United States Supreme Court	11/29/76
United States District Court of N. District of GA	04/15/74

5. Applicant presently is not subject to any suspension or disbarment proceedings, and has not been formally notified of any complaints pending before a disciplinary agency.

6. Applicant never has had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked.

7. Applicant never has had any certificate or privilege to appear and practice before any administrative body suspended or revoked.

8. Local counsel of record associated with applicant in this case is Patrick W. Turner of BellSouth Telecommunications, Inc., Suite 5200, 1600 Williams Street, Richland County, Columbia, South Carolina, 29201, Telephone Number (803) 401-2900.

9. Applicant has previously appeared *pro hac vice* in South Carolina in approximately six (6) proceedings since 1995 (one of those proceedings was before the Supreme Court).

10. Applicant agrees to comply with the applicable statutes, laws and rules of the State of South Carolina and will familiarize him/herself with and comply with the South Carolina Rules of Professional Conduct. Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.

11. Applicant respectfully requests to be admitted to practice in the above named court for this case only.

DATED this 18th day of July, 2005.



APPLICANT

VERIFICATION


STATE OF GEORGIA)
)
COUNTY OF FULTON)

I, R. Douglas Lackey, do hereby swear or affirm under penalty of perjury that I am the applicant in the above styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe them to be true.



APPLICANT/AFFIANT

Subscribed and sworn to before me this 18TH day of JULY, 2005



Notary Public for the State of GEORGIA
Brenda S. Slaughter
Notary Public, Rockdale County, Georgia
My Commission Expires July 29, 2006
My Commission Expires: _____

LOCAL COUNSEL CONSENT

I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to Rules Governing Admission *Pro Hac Vice* to the South Carolina Bar.

DATED this 8th day of August, 2005.



LOCAL COUNSEL OF RECORD

STATE BAR OF GEORGIA



Supporting Lawyers' Service to the Public and the Justice System

Mr. Robert Douglas Lackey
BellSouth Telecommunications, Inc.
675 W. Peachtree St., N.E., Suite 4300
Atlanta, GA 30375-0001

CURRENT STATUS: Active Member

DATE OF ADMISSION TO PRACTICE: 06/11/1973

Attorney Bar Number: 431050

Today's Date: July 11, 2005

Listed below are the disciplinary actions, if any, which have been taken against this member:

Supreme Court Docket #	State Disciplinary Board Docket #	Disposition
NA	NA	N/A

The prerequisites for practicing law in the State of Georgia are as follows:

- Must be certified by the Office of Bar Admissions, either by exam, or on motion (**Reciprocity**)
- Sworn in to the Superior Court in Georgia
- Enrolled with the State Bar of Georgia which is an arm of the Supreme Court of Georgia

Under the privacy/confidentiality provision of the Bar Rule 4-221(d), any complaint against a member resolved prior to the filing and docketing of a disciplinary case in the Supreme Court is not a matter of public record, and may not be revealed without a waiver from the member. It is the policy of the State Bar of Georgia to answer any inquiry about a member by disclosing only those complaints that have been docketed in the Supreme Court. With respect to matters that are currently pending as active, undocketed cases, when an inquiry is received, the State Bar of Georgia shall not disclose the existence of those complaints. Such non-disclosure should not be construed to confirm the existence of confidential complaints since the vast majority of members in good standing are not the subjects of such confidential complaints.

This member is currently in "good standing" as termed and defined by State Bar Rule 1-204. The member is current in license fees and is not suspended or disbarred as of the date of this letter.

This document hereby certifies that the above-mentioned individual is a registered member of the State Bar of Georgia and is currently in good standing.



STATE BAR OF GEORGIA

Toni Peterson
Official Representative of State Bar of Georgia

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of this application upon the South Carolina Supreme Court by **hand delivery** mail addressed to: South Carolina Supreme Court Office of Bar Admissions, PO Box 11330, Columbia, SC 29211, accompanied by payment of the \$100 filing fee payable to the South Carolina Supreme Court on this 8th day of August, 2005.

A handwritten signature in black ink, appearing to be "R. J. [unclear]", is written over a horizontal line.

APPLICANT/ AFFIANT

STATE OF SOUTH CAROLINA)
) CERTIFICATE OF SERVICE
COUNTY OF RICHLAND)

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. ("BellSouth") and that she has caused BellSouth Telecommunications, Inc.'s Motion for Admission *Pro Hac Vice* of R. Douglas Lackey in Docket No. 2004-316-C to be served upon the following this August 8, 2005.

Florence P. Belser, Esquire
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(U. S. Mail and Electronic Mail)

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Columbia, South Carolina 29211
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F. David Butler, Esquire
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Joseph Melchers
Chief Counsel
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(PSC Staff)
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Sowell Gray Stepp & Laffitte
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Columbia, South Carolina 29211
(ITC^Delta Com Communications, Inc.)
(U. S. Mail and Electronic Mail)

M. John Bowen, Jr., Esquire
Margaret M. Fox, Esquire
McNair Law Firm, P.A.
Post Office Box 11390
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(SCTC)
(U. S. Mail and Electronic Mail)

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Attorney, State Regulatory
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MCI WorldCom Communications and
MCImetro Access Transmission Services, Inc.)
(U. S. Mail and Electronic Mail)

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Law and Public Policy
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Bonnie D. Shealy, Esquire
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(U. S. Mail and Electronic Mail)

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(U. S. Mail and Electronic Mail)

Marty Bocock, Esquire
Director of Regulatory Affairs
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(Sprint/United Telephone Company)
(U. S. Mail and Electronic Mail)

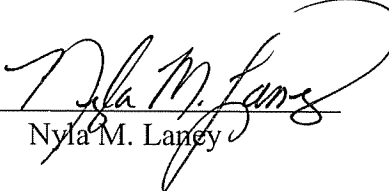
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Nyla M. Laney